

Exhibit 2

Nadine Lee Deposition

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Case No. 1:18-cv-1046

HUI MINN LEE,

Plaintiff,

-vs-

MARKET AMERICA, INC.,

Defendant.

December 4, 2020

9:37 a.m.

- - - - -

DEPOSITION

TAKEN VIA VIDEO TELECONFERENCE

OF

HUI MINN LEE

- - - - -

1 Q Okay. But no training, like actual
2 training, you did was performed in the Taiwanese
3 language?

4 A No.

5 Q Okay. Did you perform -- sorry, go ahead.

6 A The official language in Taiwan is Mandarin,
7 so that's why we all use Mandarin.

8 Q Did you perform any of your job duties in
9 Mandarin?

10 A Yes.

11 Q Tell me about those.

12 A They are trainings that I've done for Taiwan
13 market. Market Taiwan, that's what they call it. So
14 that's quite frequent. And I also have to translate
15 all the material that I -- I create in English to
16 Chinese. And, also, if others had create training
17 material, I have to translate that to Chinese and come
18 down to the training with those material.

19 Q Okay. So what language was training done
20 for the Asian market? Would you do it in Mandarin
21 for --

22 A It -- it depends. If Taiwan market also
23 involved in the same training, I might speak Mandarin
24 and use English material because other country may not
25 understand -- well, I say -- I will say all of them

1 A Yes.

2 Q Tell me about that.

3 A I came to the United States and attend
4 Auburn University at Alabama.

5 Q And did you graduate with any degrees from
6 Auburn?

7 A Yes. I got my master's degree of chemistry
8 at Auburn.

9 Q Other than your B.S. and your master's, do
10 you have any other schooling?

11 A I stay -- after I graduate and got my
12 master's degree in Auburn, I stay about half year and
13 enroll in the Ph.D. program.

14 Q Okay. Did you complete the Ph.D. program?

15 A No, I did not.

16 Q Okay. So how did you move from chemistry to
17 becoming a coach or trainer?

18 A I -- after I quit my Ph.D. program, I start
19 to raise my family. So I'm kind of leave that field
20 until my son is about 12 years old. So that's when I
21 decide to go back to work. So I -- I, basically, stay
22 home for -- for quite a while to raise my kids.

23 Q And then when you went back to work, did you
24 go straight to Market America?

25 A I -- yes.

1 Q Okay. What was your position there when you
2 started?

3 A It's a franchise service rep.

4 Q Okay. Were you looking for kind of -- were
5 you -- were you looking to change from kind of
6 chemistry and that world to the business side, or how
7 did you come to find Market America. Do you remember?

8 A I have a friend work there, and she -- she
9 introduced me.

10 Q Do you remember who that was?

11 A She -- I haven't been in contact with her
12 for quite a while.

13 Q Okay.

14 A And I -- I don't believe she's still here.
15 I mean, she probably passed away. I heard she was
16 sick and things like that.

17 Q I'm sorry to hear that. When you first came
18 to Market America, the position you had, that was not
19 in the training department?

20 A No, it was not.

21 Q Okay. How long did you stay in that
22 position?

23 A I would say a little over a year maybe. I
24 -- there is a post they are seeking for product
25 information and computer core rep. And I applied for

1 that position.

2 Q Okay. And did you get that position?

3 A Yes, I did.

4 Q All right. So when you moved to that
5 position, what were your job responsibilities?

6 A It's computer support. So if they have some
7 difficulty in the computer area, we can help them, and
8 also product information. Market America has a lot of
9 different products, so a lot of customer need help on
10 that area.

11 Q Got it. Okay. So for kind of your first
12 couple of years, you're working on the customer
13 support side, right?

14 A Correct.

15 Q Okay. What was -- what was your next change
16 in position at Market America that you remember?

17 A The training department.

18 Q Okay. How did you come to find that
19 position?

20 A I think in 2001 probably, they have a post
21 that they want to hire a trainer. So I went there and
22 applied, but I did not get the position. And another
23 gentleman named Manny got the position. The year
24 after -- I want to correct that. In 2001 that
25 position posted. I did not get it. The second year

1 in 2002, I believe, that they have the same position
2 post again. And I applied and compete with another
3 lady in the distributors service, and I got that
4 position.

5 Q Okay. At the time when you did not get that
6 position in 2001, who did -- who did you interview
7 with? Do you remember?

8 A Shawn Pegram.

9 Q I'm sorry. Who was that?

10 A Shawn -- Shawn Pegram. I cannot spell his
11 last name. I cannot remember, but his name is Shawn
12 Pegram.

13 Q Okay. And did you receive any sort of
14 explanation or reason for why you were not given the
15 position in 2001 in the training department?

16 A I'm not sure. I cannot remember whether or
17 not I get anything.

18 Q Okay. All right. And so when you applied
19 in 2002, you received that position at that time,
20 right?

21 A Correct.

22 Q Okay.

23 A Yes.

24 Q Who did you interview with in 2002?

25 A Shawn Pegram, the same gentleman.

1 like. So when were you next given a new title after
2 you started in 2002?

3 A It's until 2015, I will say, of -- the late
4 2014. That is when my title changed from trainer to a
5 senior trainer. So it's about, I think, 12 years
6 roughly.

7 Q Okay. And, to your knowledge, there was no
8 change in your title until you moved to senior
9 trainer?

10 A No.

11 Q Okay.

12 A No change.

13 Q And between 2014 when you had that senior
14 trainer title and when you left in 2017 -- or when you
15 were terminated in 2017, were there any other changes
16 in your job title?

17 A Yes.

18 Q Tell me about those.

19 A That is the global training project manager.
20 That's the title I had when I terminated.

21 Q Okay. When you started in the training
22 department, there were -- how many trainers were there
23 with you?

24 A Two.

25 Q So just you and Manny?

1 Amanda.

2 A Good.

3 Q Okay. Did you have any problems with her
4 management style when she was your manager for 10
5 years?

6 A I will say I complain to her few times that
7 -- that Cherri did not -- well, I didn't mention
8 Cherri, I should say. I say I have to always update
9 the material and -- well, Cherri -- and that's --
10 that's what I probably complain to her about that.

11 Q Okay. So you would -- you had complaints
12 that you would bring to Amanda at times?

13 A Right, right.

14 Q Okay. And how would Amanda handle those
15 complaints?

16 A She kind of agree with me, but there's no
17 action taken.

18 Q Okay. And would you go back to her with
19 additional concerns that nothing was being handled or
20 how would you -- what would you do when you saw
21 nothing being done?

22 A It's when -- well, I, basically, just do
23 what I have to do and, you know, keeping my mouth shut
24 most of the time because I -- I want, you know, my
25 job. But the final straw was 2013, I would say -- the

1 about.

2 Q Why did you feel you needed a record of what
3 you were talking about with Amanda in November of
4 2013?

5 A Because I feel -- prior to that, I had been
6 bringing it up and bringing it up and there's nothing
7 done. So I think I probably need to make a record I
8 really talk about this.

9 Q Who did you plan -- at the time -- at the
10 time you decided to make a recording of this, who did
11 you plan to share it with? And I'm talking about the
12 2013 recording?

13 A I had -- I did not think I want to share it
14 with anybody. Just for my -- me as a record at that
15 time.

16 Q And what was -- what did you plan to do with
17 that other recording once you had it in 2013?

18 A I don't know. I -- I cannot tell you in
19 2013 what I was thinking back then. Back then the
20 only thing I wanted to have is the record that I have
21 this conversation with her, but I -- I did not think
22 anything other than that.

23 Q Okay. So is it fair to say the recordings
24 in 2013 were made just so you could go back and listen
25 to the conversation and see what Amanda said she would

1 do?

2 A And, also, I want her to tell Liliana
3 because back then Liliana already on boat. Over the
4 years, she always tell me that she is empower me to
5 direct Cherri to do things, but -- but that's never
6 official. She never tell Cherri that I have
7 authority, can direct her to do anything. So I was
8 want her to make sure that she told Liliana that she
9 is empowering me to direct her to -- you know, for her
10 job.

11 Q So in 2013 you wanted Amanda to tell Cherri
12 and Liliana that you could tell your --

13 A No.

14 Q -- other trainers what to do?

15 A No. Not Cherri.

16 Q Okay.

17 A Cherri already move away from -- well, her
18 plan was move Cherri away from Market America
19 training. But for me to take care of Market America
20 portion of the training, she wanted Liliana to help
21 me. But I just want her to -- she keep saying
22 empowering me, but never actually authorize and let
23 people know that's what she planning to do. So I want
24 her to -- I just want to be sure that she would tell
25 Liliana that what her plan was.

1 you would coordinate with Liliana for other things
2 that needed to be done in the department?

3 A Well, by the time Liliana start working, we
4 had already changed the supervisor. That -- Amanda
5 left in January of 2014. I think it's the first part
6 of 2000 -- January 2014. And we do not have any
7 manager until March I believe, so I was the interim
8 manager and supervise her.

9 Q Who were you supervising in the interim?

10 A Liliana.

11 Q That was your -- the only person you were
12 supervising?

13 A That's the only person. She was doing -- if
14 she was there. Cherri already moved to the leadership
15 training. She's not doing the same thing, what we do.

16 Q Who told you in Market America that you were
17 the interim supervisor during that time from January
18 to March of 2014?

19 A I take the responsibility myself because
20 everybody was contact me if they have any training
21 issues or training requirements.

22 Q Okay. And then at some point Colbert
23 Trotter was hired, correct?

24 A Yeah. March maybe.

25 Q All right. And Colbert became your direct

1 A Yes, I -- I saw that.

2 Q Do you have any reason to disagree with that
3 date?

4 A I thought I remembered March, but if -- if
5 -- that's what she say there.

6 Q Okay. And then it has the -- her kind of
7 leaving date or last month as November 2016. Does
8 that sound correct?

9 A Yes. November, yes.

10 Q Okay. All right. Okay. Now, we talked
11 about your fellow, like, coworkers' ages. Do you know
12 exactly how old Colbert Trotter was?

13 A No. I would say late 40 to early 50.
14 That's my guessing. The -- the information that she
15 gave me, like, how old is her daughter and that -- all
16 that type of thing, that -- that's my guess.

17 Q Okay. She didn't talk to you about when she
18 graduated college or anything like that?

19 A I -- I don't recall.

20 Q Okay. Did Colbert Trotter tell you
21 specifically the reason that she was promoting Liliana
22 to a manager role?

23 A No, not specifically. I -- I questioned her
24 and she told me that she was promoted I would say
25 August 2016. She called me to her room and say that

1 Liliana was -- I'm sorry, there's a phone call. Can
2 -- can I take this?

3 MS. DEBOARD: We can go off the record for a
4 second if you need to.

5 [Recess from 10:59 a.m. to 11:00 a.m.]

6 Q [By Ms. DeBoard] Okay. So your
7 conversations with Colbert Trotter about Liliana
8 becoming a manager, when you -- actually, when you
9 said you questioned Ms. Trotter about that, what
10 exactly were you asking?

11 A I was asking why I was demoted.

12 Q Why did you believe that it was a demotion?

13 A Because she was a subordinate of me. And
14 then I would report to Colbert at the time. Now, I
15 had demoted to report to Liliana.

16 Q Who -- who told -- did anyone tell you that
17 was a demotion?

18 A No, nobody. But the fact is when I report
19 to a director before, now I have to report to a
20 manager, don't you think that's a demotion? Well, I
21 would assume that's a demotion.

22 Q What did Colbert Trotter say when you
23 approached her about this?

24 A She say, "No, no, no. I know what to do."

25 Q And what did she mean by that?

1 Liliana because she was -- the title-wise, she is a
2 training specialist. I was a trainer already. And
3 later on, I became a senior trainer and she's still a
4 trainer. So I always had the higher rank than she is
5 -- she was.

6 Q When -- at that point -- so at that point
7 did you ever give a performance review to Liliana?

8 A No, I had not.

9 Q Okay. Did you have authority to give a
10 written performance review to Liliana?

11 A No, I -- I do not.

12 Q Okay. Do you know whether Colbert Trotter
13 gave a performance review to Liliana in 2016?

14 A I assume. I didn't see her review, so I
15 don't know.

16 Q Okay. So at some point Colbert Trotter was
17 moved from training manager to director, right?

18 A Oh, correct.

19 Q Okay. And then so there was an open space
20 for training manager, right?

21 A Yes.

22 Q All right. And that was the space that
23 Liliana filled?

24 A That space, she told me through my -- April
25 -- I think it's April 2016 -- I asked her that since

1 she already become a director, whether or not she need
2 a manager position. And she say, no, she's not
3 planning to have a manager.

4 Q Okay. At that time in April?

5 A April of 2016. I cannot say exact time
6 because I remember that's a conversation when we have
7 an evaluation. And that evaluation happened April of
8 2016, so I assume that's -- that's the date.

9 Q Okay. And then in August of 2016 is when
10 you were told about Liliana moving into a management
11 role?

12 A Correct.

13 Q All right. In that conversation with
14 Colbert Trotter where you were informed about Liliana
15 going into a management role, did you specifically ask
16 her whether that was based on Liliana's age?

17 A Not at the first -- that meeting till she
18 informed me. The way she's doing it is -- well,
19 anyway, she called me to her office and tell me that
20 Liliana being promoted. And that's end of the
21 conversation. I bring this up because I was keep --
22 that keep bothering me. And I had a lot of sleepless
23 night and just trying to figure out what's going on.
24 So I went back to her and asked her why this happened
25 and why I'm being demoted.

1 Q And what was Colbert Trotter's response when
2 you asked that?

3 A I did specifically ask her is that because
4 she -- she like to promote young people and for them
5 to advance in -- for their career and also was my race
6 playing a part. And she say, "No, no, no. I know
7 what to do."

8 Q Okay. So in response to the question about
9 is it because of my age, Colbert Trotter said no?

10 A That's what she say, "No, no, no."

11 Q And then in response to the question is this
12 because of my race or because me, as Nadine Lee, I'm
13 -- I am of Asian -- you know, Asian origin, Colbert
14 Trotter --

15 A Uh-huh.

16 Q -- said no?

17 A She say, "No, no, no. I know what to do."
18 That -- that's what I remember, how she replied.

19 Q Okay.

20 A If there's any other conversations or
21 wording in there, I -- I can't -- I -- I don't recall.

22 Q Okay. And so what -- what did she do as a
23 result. She said, "I know what to do." What did that
24 mean?

25 A She changed my title from the -- the senior

1 that would be Colbert.

2 Q Okay. So Colbert assigned her to do the
3 Market -- Market Mexico training and opening?

4 A Yes. I -- I will agree with that.

5 Q Okay. Were you assigning trainings to
6 Liliana at that point when Colbert was there, so
7 before -- like between February '14 and August of
8 2016?

9 A When -- I believe that -- I cannot remember
10 that correctly, but I believe the second training that
11 she -- Liliana was doing, that's when I assigned to
12 her. I'm not sure if Colbert is there yet for the
13 second training that -- that Liliana did.

14 Q Okay. So you were mainly involved with
15 Liliana's training of how to be a training specialist?

16 A Say that again?

17 Q You were mainly involved with kind of
18 coaching and helping Liliana in the beginning stages
19 of her employment?

20 A Yeah, I will say that.

21 Q Okay. And then once Colbert Trotter got
22 there, Colbert was giving assignments to Liliana?

23 A Correct.

24 Q Okay. And then Liliana was taken from
25 training specialist and moved to manager?

1 A She had a couple promotions in between.

2 Q Okay. Tell me your under -- just your
3 understanding of what Liliana's promotions were in
4 between?

5 A She start from training specialist, then
6 trainer, and senior trainer, and manager.

7 Q Okay. Before she became manager, did you
8 have any issues with Liliana's treatment of you
9 personally?

10 A No. I just know that she was -- you know,
11 refer the culture issues of Asians, so I aware she's
12 -- she's not very fond with Asians.

13 Q Did she ever treat you differently than non-
14 Asian workers before she was a manager?

15 A She was very fond with Henri. She
16 handpicked Henri, and -- well, she -- she -- when we
17 had that opening for Henri, she actually go Henri and
18 tell her that apply this position, we will hire you.
19 And that I did talk to Cherri about it, saying was
20 that a proper thing to do, but we didn't say anything.

21 Q Okay. Why did you talk to Cherri about it?

22 A Because Henri was going around -- I heard
23 from somebody that Henri was going around saying,
24 well, I'm moving to training because Liliana say that
25 she is going to train her -- train him to become a

1 one of my job responsibility. And she say she doesn't
2 like that. She want me to share that with Henri. I
3 didn't say much about it at the time because she just
4 inform me that she was my boss. And I did not hear
5 from anybody else, so I went to talk to Sherry and
6 just to confirm if this is what happened. And why am
7 I being demoted again since we were all report to
8 Colbert when she left. Now I'm being demoted again
9 under Liliana. And she say that, yes, this is what
10 happened. Marc decide that. And I share my concern.
11 I say why is that because my two -- well, it's,
12 basically, the same conversation with Colbert.

13 Q Did your pay change when you started to
14 report to Liliana?

15 A Did my what change?

16 Q Did your -- did your money -- your income --
17 change when you started to report to Liliana?

18 A No.

19 Q Did your title change when you started to
20 report to Liliana as your manager?

21 A No.

22 Q Why did you -- did someone tell you that it
23 was a demotion to report to Liliana?

24 A Well, to me it was because, you know, when
25 you report to a -- a director and now you do -- you

1 report to a manager, that is a demotion.

2 Q Okay. So that -- that's you. Did anyone,
3 outside of yourself, tell you it was a demotion to
4 report to Liliana Camara as a manager?

5 A No.

6 Q So it's just something you felt? You did
7 not want to report to Liliana?

8 A It's not I don't wanted to report to
9 Liliana. I -- I think that's why should -- just like
10 when she was first promoted, I should have opportunity
11 to seek the position. And there is no post, nothing.
12 And give me the opportunity to seek the position.

13 Q Okay. Did you -- did you say that to anyone
14 -- or the individuals who told you Liliana was getting
15 the manager position, like Colbert Trotter?

16 A I said it to Colbert I was telling you
17 earlier.

18 Q Did you report that to Sherry Spesock at any
19 point before December 2016?

20 A What do you mean?

21 Q Did you talk --

22 A Not work -- not work related because when
23 Colbert left, that -- she told us that she already
24 arrange with Sherry and all three of us would report
25 to Sherry.

1 -- Liliana and I meet, I tell her that I had talked to
2 Sherry about the job responsibility and that's what
3 Sherry told me.

4 Q Okay. And --

5 A And -- and she bring up that the -- the
6 training that she want me to rotate with Henri. And
7 she told me that I should allow young people to have
8 opportunity to build their network. So MPCP is a very
9 -- because MPCP -- well, she -- everybody -- whoever
10 on the Colbert label. So anybody from different
11 department can come to that class. It's not only for
12 distributor services. And she want Henri to have that
13 opportunity to grow up his network and give him
14 opportunity to advance. So I was telling her that I
15 have a concern that she -- he is not familiar with the
16 -- the training. And I'm willing to teach him and
17 supervise him afterwards until he can come up to
18 speed. And that make Liliana quite unhappy because
19 she start to attack me. She said something that I --
20 I'm -- I will not dictate this program. I don't want
21 to give up the -- the training. I don't want -- I
22 don't have a teamwork mentality. I'm not a team
23 player because I don't want to share that
24 responsibility with Henri. And I explained to her
25 that's not what I'm saying. I say that once he can

1 get up to speed, I have no problem that -- sharing
2 responsibility, but still I want to supervise him
3 because that -- I am responsible for that program.
4 And she start to say that I wouldn't listen to my
5 former boss. So I -- I -- I start to aware he --
6 she's attacking me. And so I replied to her that's
7 not to true. I'm sorry I get a little emotional every
8 time I talk about this. She was -- she start
9 attacking me and told me that I never listen to my
10 former boss. And I was asking her, "Why are you
11 saying that? That's not true." And she said -- and I
12 explained to her that if -- if that's the case, I
13 won't stay -- I won't be at Market America for that
14 long. You know -- you know, if you don't listen to
15 your boss, you probably got fired long time ago. So
16 what you say is not true. And then after that, she
17 was telling me -- I -- I'm sorry, I lost my thought a
18 little. Oh, the next thing she come up with was that
19 I was dumping work to her when she start work at
20 Market America. And I'm kind of puzzled what she was
21 talking about. And she starts saying remember that
22 when you -- when I start, and the six weeks of
23 training was most time-consuming, and by the time you
24 supposed my -- your turn, I didn't -- I didn't do it.
25 So I have to explain to her what happened back then.

1 led to that.

2 A She told me that there's a request for
3 training the -- on franchises services new hire
4 training, which we established that during January 3rd
5 meeting that belonged to Henri. And she want me to do
6 that training, you know, at Jan -- at -- that start at
7 January. And that's a third-shift training that she
8 want me to do.

9 Q So she --

10 A And I --

11 Q -- wanted you to do that and not Henri?

12 A Yes, she did. She said that it's -- there
13 is a new hire for Mandarin speaking and she need my
14 help. And I did agree that I will help. And I say
15 sure. We don't have that type of training, so called
16 Mandarin, our franchise service training before. If I
17 want -- I -- I have to recall one that is back to
18 2005. That's when we started -- the first time we
19 start to -- the -- the Market Taiwan. But after that,
20 we never had that so-called Mandarin on franchise
21 services training. So that's a new training that she
22 come up with. And she want me to do that entry-level
23 training because there is a Mandarin speaking, you
24 know.

25 Q And did you do that training in Mandarin?

1 A Yes, I did.

2 Q Okay. Did you -- did you report any
3 complaints of you having to do that training to anyone
4 else?

5 A I did not because Sherry and Liliana was
6 together and say I have to do it.

7 Q So did you talk to Sherry about that --
8 about doing that entry-level training?

9 A No. When I -- when I was called to Sherry's
10 office, I know that, you know, Sherry is involved in
11 this and trying to diminish my role within the
12 department.

13 Q Why -- so why is taking on an extra training
14 diminishing your role?

15 A Because that's an entry-level training. I
16 have not done that I would say at least, maybe, five,
17 six years.

18 Q Okay. So you felt that that training was
19 kind of beneath your qualifications?

20 A Yes. I had take care of -- I -- I believe I
21 had send you a job responsibility that -- that I -- I
22 had -- we have established on January 3rd.

23 Q Okay. That -- so that job responsibilities
24 document, was that -- did you make that from memory or
25 was that based on notes?

1 Q Okay. What about three and four? Just
2 review those and let me know if there is anything that
3 is -- or if these are kind of accurate based on what
4 we've been discussing today in your memory.

5 A Number 3 is right. I did ask for new
6 Mandarin training -- trainers because that -- if
7 that's the -- it become regular that they want to
8 offer Mandarin training, then -- then they should hire
9 another one. Number 4, yeah, that -- that is what I
10 was talking about they called me to they office and
11 say I have to do this training. I -- I agree to do
12 that training during February's meeting already. I
13 didn't say that I don't want to do it. I just suggest
14 her that she need to hire one more trainer if this
15 become regular. And -- but I got called in there and
16 being demand to do this training, I was kind, well, I
17 already agreed to why you -- you know, I was being
18 called there and demand to do that. That's Number 4.

19 Q Okay. What about five, six, and seven, are
20 those all true and accurate?

21 A Five I cannot recall exact time. It may be
22 off a little. I cannot recall exact time. I
23 remembered 27, so that's what I put in February. It
24 may be, you know, later. I cannot recall exactly the
25 time frame of that. Number -- Number 6 is what we

1 were talking about, the evaluation earlier that -- I
2 don't know who did that, but Sherry did -- Sherry did
3 tell me that -- that done the review herself.

4 Q Did you record that conversation with Sherry
5 about your pay increase?

6 A NO.

7 Q Why not?

8 A Because I -- I was called to her office
9 without knowing what it was about.

10 Q Okay. In April or May of 2017, were -- was
11 the Spain Market and Mexico Market still open?

12 A I believe so, yes. And she has a post --
13 that post in the break room. And she specifically say
14 she want to hire a Spanish-speaking trainer. Can you
15 scroll up? I was not able to see the -- can I look at
16 seven again?

17 Q Here you go.

18 A And when she post that and say that she want
19 to hire a Spanish-speaking training specialist, I then
20 went to suggest to her maybe we need to -- to have
21 Mandarin-speaking trainers or specialists since she
22 had want to do an entry-level Mandarin speaking
23 training which lasts -- lasts a few weeks

24 Q And what did she say in response?

A She said that's what she need and just --

1 we did for years.

2 Q Okay. And then you put in here new hires
3 without certain English capability will have
4 tremendous hardship to perform their job. Is it your
5 opinion --

6 A Correct.

7 Q -- if they didn't speak English they
8 probably weren't qualified for the -- the job that
9 they were hired for?

10 A It's not my opinion. It's our material and
11 also all the systems and when they have to do the
12 paperwork and -- with any correction for the system,
13 everybody is using English. So if they don't
14 understand English, they were not able to perform that
15 job. There is no Mandarin system for them to use when
16 they're performing jobs.

17 Q Okay. What about 11; is that accurate?

18 A Yeah. I believe that I received an e-mail
19 from Brandy saying that new hire, there's only one
20 person. Liliana want me to do a Mandarin speaking for
21 her, and I suggest to Brandy at the previous one. And
22 then later Brandy e-mailed me saying this person has
23 50 percent English -- English capability, so she can
24 communicate and talk to the customer, yes. This is
25 correct. Again, I'm not going to say 100 percent

1 because of that time. I cannot recall exact time I
2 have.

3 Q Okay. So I'm kind of a little confused.
4 What's the importance of this Number 11? What's the
5 importance of this?

6 A I just want to establish that the Mandarin
7 speaking class that she asked me to do, this person
8 actually can speak English. It's not that she cannot
9 speak English then have to have a Mandarin-speaking
10 class.

11 Q Okay. Was there only one person in the
12 training class?

13 A Yes. Only one person that she want me to
14 train, but there's another class that Henri is doing
15 later. This person could join Henri's class, which is
16 English speaking. And I offer help and tell Brandy
17 that I can help her. Just like before, I can help
18 her. When she finish the English class, then I will
19 be able to help her with a couple weeks, just like I
20 described to you earlier that for one or two hour a
21 day and bring her -- fill in the gap that she missed
22 for -- from English.

23 Q Okay. Is Brandy -- was she the -- she was a
24 new director; is that correct?

25 A Yeah. She was there probably less than half